///

- municipal corporation organized and existing under the laws of the state of California, and operating in the County of Los Angeles, State of California, with its principal place of business located at 200 N. Spring Street, Los Angeles, CA 90012.
- 4. Petitioner is informed and believes, and based thereon alleges, that ERIC GARCETTI d/b/a THE OFFICE OF LOS ANGELES MAYOR ERIC GARCETTI ("GARCETTI'S OFFICE", together with the CITY OF L.A. "Respondents") is, and at all times relevant herein was, the Mayor of the City of Los Angeles, and in this capacity served as a public agency acting as the governing body of the City of Los Angeles, organized and existing under the laws of the state of California, and operating in the County of Los Angeles, State of California, with its principal place of business located at 200 N. Spring Street, Los Angeles, CA 90012.
- 5. The true names and capacities of Respondents sued herein as DOES 1 through 50 are unknown to Petitioner at this time, and therefore, Petitioner sues said Respondents by such fictitious names. Petitioner will seek leave to amend this complaint to allege their true names and capacities when the same have been ascertained. Petitioner is informed and believes, and based thereon alleges, that each of Respondents designated as a DOE is responsible in some manner for the events alleged herein and the damages caused thereby.
- 6. Petitioner is informed and believes and thereupon alleges that at all times relevant hereto each of Respondents including DOES 1 -50 acted in concert with each other, was the agent, affiliate, officer, director, manager, principal, alter-ego, and/or employee of the remaining Respondents and was at all times acting within the scope of such agency, affiliation, alter-ego relationship and/or employment; and actively participated in or subsequently ratified and adopted, or both, each and all of the acts or conduct alleged, with full knowledge of all the facts and circumstances, including without limitation to full knowledge of each and every wrongful conduct and Petitioner's damages caused therefrom.

1st CAUSE OF ACTION: IMPROPER WITHHOLDING OF PUBLIC RECORDS UNDER GOV. CODE § 6250 ET SEQ.

- 7. Petitioner repeats and alleges all the allegations stated herein, and incorporates by this reference each and every allegation contained therein as though fully set forth herein.
- 8. Respondents are required to comply with the California Public Records Act ("CPRA"), Government Code section 6253(b), which states: "Except with respect to public records exempt from disclosure by express provisions of law, each state or local agency, upon a request for a copy of records that reasonably describes an identifiable record or records, shall make the records promptly available to any person upon payment of fees covering direct costs of duplication, or a statutory fee if applicable."
- 9. On or about June 6, 2018, Petitioner submitted a request for public records to Respondent GARCETTI'S OFFICE, requesting access to and copies of specified public records under the CPRA, Government Code section 6250, et seq. ("Public Records"). Petitioner's request for Public Records identified eight categories of records sought in relation to GARCETTI'S OFFICE's "Homeless Solutions Workshop," held on or around June 5, 2018, to investigate allegations that GARCETTI'S OFFICE prevented several members of the Korean American community from attending the Workshop by blacklisting them. A true and correct copy of Petitioner's request for Public Records is attached hereto as Exhibit A.
- 10. On or about June 18, 2018, Respondent GARCETTI'S OFFICE sent Petitioner's counsel a determination letter in response to Petitioner's Public Records request. A true and correct copy of the determination letter from GARCETTI'S OFFICE is attached hereto as Exhibit B.
- 11. In its determination letter, GARCETTI'S OFFICE ambiguously stated it would only disclose some of the records, but did not clearly identify which records would not be disclosed, or provide justification for the refusal to disclose all of the records requested.
- 12. Respondent GARCETTI'S OFFICE has improperly refused to disclose Public Records to which Petitioner is entitled under the CPRA, Government Code section 6250, *et seq*.

GARCETTI'S OFFICE'S refusal to disclose records is improper for the following reasons:

a. The Disclosure Date Does Not Comply with the CPRA

CPRA § 6253(c) states: "Each agency, upon a request for a copy of records, shall, within 10 days from receipt of the request, determine whether the request, in whole or in part, seeks copies of disclosable public records in the possession of the agency and shall promptly notify the person making the request of the determination and the reasons therefor." Cal. Gov't Code § 6253. This section also provides that "[i]n unusual circumstances, the time limit prescribed in this section may be extended by written notice by the head of the agency or his or her designee to the person making the request, setting forth the reasons for the extension and the date on which a determination is expected to be dispatched." *Id.* (emphasis added). Furthermore, "[n]o notice shall specify a date that would result in an extension for more than 14 days." *Id.* (emphasis added).

GARCETTI'S OFFICE's determination letter states: "The Office has determined that your Request, in part, seeks copies of disclosable public records that are in its possession. Pursuant to Government Code Section 6253(c), we are consulting with other relevant parties and will provide documents responsive to your Request by July 20, 2018. You will be notified in writing of any revisions to this estimate."

This time frame does not comply with CPRA § 6253. GARCETTI'S OFFICE has neither identified the records it will not disclose nor provided reasons for the denial of the disclosures. No reasons for the extension of time have been given; all that is stated is that GARCETTI'S OFFICE is "consulting with other relevant parties." Finally, the extension is approximately 44 days from the date of the original Public Records request, and approximately 32 days from the date of the determination letter. This is well-past the 14-day extension limit stated in the statute.

b. The Vague Denial of Disclosure Does Not Comply with the CPRA

§ 6255 of the CPRA requires any agency that denies a request for public records to "justify withholding any record by demonstrating that the record in question is exempt under express provisions of this chapter or that on the facts of the particular case the public interest

served by not disclosing the record clearly outweighs the public interest served by disclosure of the record." Cal. Gov't Code § 6255. The denial must be made in writing, and the names and titles or positions of each person responsible for the denial must be given. *See id.*; Cal. Gov't Code § 6253.

In denying part of Petitioner's request for Public Records, GARCETTI'S OFFICE only states that it has "determined that [Petitioner's] Request, **in part**, seeks copies of disclosable public records that are in its possession," and that it "will decline to produce any records that fall into any of the . . . well-established exemptions to the CPRA." (Emphasis added).

This denial falls short of the requirements of § 6255. GARCETTI'S OFFICE has not identified which records it will not disclose. It has not stated which records fall within the exemptions expressly identified by the CPRA. It has not indicated which public interest is served by not disclosing the records, and it has not demonstrated that any public interest served by refusing disclosure "clearly outweighs" the public interest served by disclosure. Outside of the party who wrote the letter, no other names, titles, or positions of the persons responsible for the denial have been given. As all of these items are required by the CPRA, GARCETTI'S OFFICE's denials are deficient.

c. The Response to Request No. 3 Is Improperly Limited to Records <u>From</u> Councilman Wesson

The only records request category specifically addressed in the determination letter is Request No. 3, which seeks "ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating or pertaining to Mayor Garcetti's Office of Public Engagement's 'Homeless Solutions Workshop' held on or around June 5, 2018 . . . sent or received by City Councilman Herb Wesson or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018."

In response to Request No. 3, GARCETTI'S OFFICE states: "to the extent the Office has in its possession any responsive, non-exempt records reflecting [] documents regarding the Homeless Solutions Workshop on June 5 from Councilman Herb Wesson, we will provide such records to you pursuant to request no. 1 which seeks such records from the Office."

This is not what has been requested in Petitioner's public records request, and limiting the records disclosed to only those documents "from" Councilman Wesson functions as a denial of the other records sought in Request No. 3. This form of denial does not comply with the requirements of § 6253 and § 6255 described above.

- 13. Since it is unclear which public records GARCETTI'S OFFICE has improperly refused to disclose, any one of the following categories of Public Records may have been improperly refused:
 - "1. ALL DOCUMENTS referring to, analyzing, commenting, considering, preparing, evaluating, or pertaining to Mayor Garcetti's Office of Public Engagement's 'Homeless Solutions Workshop' held on or around June 5, 2018, including without limitation to meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, emails, text messages, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Mayor Eric Garcetti or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018."
 - "2. ALL EMAIL CORRESPONDENCE referring to, analyzing, commenting, considering, preparing, evaluating, or pertaining to Mayor Garcetti's Office of Public Engagement's 'Homeless Solutions Workshop' held on or around June 5, 2018 at any time on or after 4/15/2018. 'ALL EMAIL CORRESPONDENCE' must include all emails to and from the email account daniel.tamm@lacity.org, Mayor Garcetti's email account, and any of the email accounts of anyone in Mayor Garcetti's offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018."
 - "3. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating or pertaining to Mayor Garcetti's Office of Public Engagement's 'Homeless Solutions

Workshop' held on or around June 5, 2018, including without limitation to meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, emails, text messages, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Councilman Herb Wesson or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018."

"4. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating and/or pertaining to Suejung Huh, K. Freeman Lee, Grace Yoo, Chan Yong Jeong, and/or Jake Jeong, including without limitation to emails and any related attachments, text messages, meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Mayor Eric Garcetti or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018."

"5. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating and/or pertaining to parties or individuals invited to attend Mayor Garcetti's Office of Public Engagement's 'Homeless Solutions Workshop' held on or around June 5, 2018, including without limitation to lists, meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, emails, text messages, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Mayor Eric Garcetti or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018."

"6. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating and/or pertaining to parties or individuals who participated in, RSVP'ed, and/or attended

Mayor Garcetti's Office of Public Engagement's 'Homeless Solutions Workshop' held on or around June 5, 2018, including without limitation to lists, meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, emails, text messages, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Mayor Eric Garcetti or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018."

"7. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating and/or pertaining to parties or individuals excluded from attending Mayor Garcetti's Office of Public Engagement's 'Homeless Solutions Workshop' held on or around June 5, 2018, including without limitation to lists, meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, emails, text messages, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Mayor Eric Garcetti or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018."

"8. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating, and/or pertaining to City staff who prepared any portion of and/or worked at Mayor Garcetti's Office of Public Engagement's 'Homeless Solutions Workshop' held on or around June 5, 2018, including without limitation to any lists of staff members who participated in preparing the Homeless Solutions Workshop, any lists of staff members who worked at the Homeless Solutions Workshop, including the security guards at the front door, meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, emails, text messages, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Mayor

Eric Garcetti or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018."

WHEREFORE, Petitioner prays for judgment against all Respondents as follows:

AS TO ALL CAUSES OF ACTION AGAINST ALL RESPONDENTS:

- For equitable relief in the form of a writ of mandate commanding Respondents CITY OF
 L.A. and GARCETTI'S OFFICE to comply with the Public Records Act by promptly
 providing to Petitioner all of the requested Public Records, including without limitation,
 Public Records that have been withheld by Respondent GARCETTI'S OFFICE as
 indicated in paragraph 13;
- 2. For costs of suit incurred in enforcing Petitioner's rights under the Public Records Act;
- 3. For attorneys' fees incurred in enforcing Petitioner's rights under the Public Records Act;
- 4. For such other and further relief as this court shall deem just and proper.

Dated: June 20, 2018

Respectfully submitted,

C. Yong Jeong, Esq. Regina Zernay, Esq.

Attorneys for HYE KYUNG JOUNG

VERIFICATION

I, HYE KYUNG JOUNG, declare:

I am the Petitioner in this proceeding. I have read the foregoing Petition, and the matters stated in it are true of my own knowledge, except as to those matters that are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the law of the State of California that the foregoing is true and correct.

Executed on June ____, 2018

Petitioner

EXHIBIT A

June 6, 2018

Attn: Mayor Eric Garcetti

200 N. Spring St.

Los Angeles, CA 90012

Email: mayor.garcetti@lacity.org; david.e.harrison@lacity.org

Re: Request for Records Under the Public Records Act

Re: Mayor Garcetti's Office of Public Engagement's "Homeless

Solutions Workshop" held on or around June 5, 2018

To Whom It May Concern:

I represent Hye Kyung Joung, a resident of the City of Los Angeles and one of your constituents. Pursuant to Cal. Gov't Code §§ 6250 through 6276.48 ("California Public Records Act" or "CPRA"), Ms. Joung hereby makes an official request for any and all records described below:

"ALL" is meant to include the terms "each" and "any" and vice-versa, as necessary to bring within the scope of the request all responses that might otherwise be construed to be outside the scope of the request.

"DOCUMENT(S)" means ALL materials within the full scope of Cal. Civ. Proc. Code § 2031.010, including without limitation to: ALL writings and recordings, including the originals and ALL non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise (including but not limited to email and attachments, text messages, correspondence, memoranda, notes, diaries, minutes, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, tags, labels, invoices, brochures, periodicals, telegrams, receipts, returns, summaries, pamphlets, books, interoffice and intraoffice communications, offers, notations of any sort of conversations, working papers, applications, permits, file wrappers, indices, telephone calls, meetings or printouts, teletypes, telefax, invoices, worksheets, and ALL drafts, alterations, modifications, changes, and amendments of any of the foregoing), graphic or aural representations of any kind (including without limitation to photographs, charts, microfiche, microfilm, videotape, recordings, motion



pictures, plans, drawings, surveys), and any writings, drawings, graphs, charts, photographs, electronic, recorded, digitally encoded, graphic, and/or other data compilations from which information can be obtained, translated if necessary, by the RESPONDING PARTY through detection devices into reasonably usable form, or other information, including originals, translations, and drafts thereof, and ALL copies bearing notations and marks not found on the original.

"RESPONDING PARTY" is meant to refer to Eric Garcetti and any persons acting on Eric Garcetti's behalf, which includes but is not limited to Eric Garcetti's agents, employees, representatives, and attorneys.

- 1. ALL DOCUMENTS referring to, analyzing, commenting, considering, preparing, evaluating, or pertaining to Mayor Garcetti's Office of Public Engagement's "Homeless Solutions Workshop" held on or around June 5, 2018, including without limitation to meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, emails, text messages, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Mayor Eric Garcetti or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018.
- 2. ALL EMAIL CORRESPONDENCE referring to, analyzing, commenting, considering, preparing, evaluating, or pertaining to Mayor Garcetti's Office of Public Engagement's "Homeless Solutions Workshop" held on or around June 5, 2018 at any time on or after 4/15/2018. "ALL EMAIL CORRESPONDENCE" must include all emails to and from the email account daniel.tamm@lacity.org, Mayor Garcetti's email account, and any of the email accounts of anyone in Mayor Garcetti's offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018.
- 3. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating or pertaining to Mayor Garcetti's Office of Public Engagement's "Homeless Solutions Workshop" held on or around June 5, 2018, including without limitation to meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, emails, text messages, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Councilman Herb



Wesson or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018.

- 4. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating and/or pertaining to Suejung Huh, K. Freeman Lee, Grace Yoo, Chan Yong Jeong, and/or Jake Jeong, including without limitation to emails and any related attachments, text messages, meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Mayor Eric Garcetti or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018.
- 5. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating and/or pertaining to parties or individuals invited to attend Mayor Garcetti's Office of Public Engagement's "Homeless Solutions Workshop" held on or around June 5, 2018, including without limitation to lists, meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, emails, text messages, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Mayor Eric Garcetti or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018.
- 6. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating and/or pertaining to parties or individuals who participated in, RSVP'ed, and/or attended Mayor Garcetti's Office of Public Engagement's "Homeless Solutions Workshop" held on or around June 5, 2018, including without limitation to lists, meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, emails, text messages, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Mayor Eric Garcetti or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018.
- 7. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating and/or pertaining to parties or individuals excluded from attending Mayor Garcetti's Office of Public Engagement's "Homeless

Solutions Workshop" held on or around June 5, 2018, including without limitation to lists, meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, emails, text messages, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Mayor Eric Garcetti or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018.

8. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating, and/or pertaining to City staff who prepared any portion of and/or worked at Mayor Garcetti's Office of Public Engagement's "Homeless Solutions Workshop" held on or around June 5, 2018, including without limitation to any lists of staff members who participated in preparing the Homeless Solutions Workshop, any lists of staff members who worked at the Homeless Solutions Workshop, including the security guards at the front door, meeting minutes, notes, records, reports, analysis, telephone logs, statistical data, inquiries, correspondence, emails, text messages, plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or received by City Mayor Eric Garcetti or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2018.

Pursuant to the CPRA, we will expect to receive notification from your office within 10 days from receipt of our request that provides: (1) a determination of whether the request, in whole or in part, seeks copies of disclosable public records in your possession; (2) the reasons for your determination; and (3) the estimated date and time when the records will be made available.

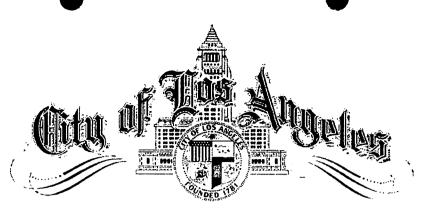
Should you have any questions or need additional information, please contact my office.

Sincerely,

/s/ Chan Yong Jeong
C. Yong Jeong, Esq.
JEONG & LIKENS, L.C.

06/20/2018

EXHIBIT B



ERIC GARCETTI MAYOR

June 18, 2018

VIA E-MAIL: (regina.zernay@jeonglikens.com)

C. Yong Jeong, Esq. Jeong & Likens L.C. 222 S. Oxford Ave. Los Angeles, CA 90004

Re: California Public Records Act Request

Dear Mr. Jeong,

This letter responds to your June 6, 2018 California Public Records Act ("CPRA") request to the Office of the Mayor of Los Angeles ("Office") seeking records pertaining to the June 5, 2018 Homeless Solutions Workshop held in conjunction with the Mayor's Office of Public Engagement (Request). The Office has determined that your Request, in part, seeks copies of disclosable public records that are in its possession. Pursuant to Government Code Section 6253(c), we are consulting with other relevant parties and will provide documents responsive to your Request by July 20, 2018. You will be notified in writing of any revisions to this estimate.

Please note that Request No. 3 seeks documents "made, reviewed, discussed, considered, sent or received by City Councilmember Herb Wesson or anyone in his offices such as staff, contractors, experts, advisors, secretaries, or employees at any time on or after 4/15/2015." As noted in our June 18, 2018 letter to you regarding your CPRA request pertaining to the proposed Emergency Homeless Shelter at 682 S. Vermont Ave, to the extent the Office has in its possession any responsive, non-exempt records reflecting to documents regarding the Homeless Solutions Workshop on June 5 from Councilman Herb Wesson, we will provide such records to you pursuant to request no. 1 which seeks such records from the Office. However, if you seek additional records "made, reviewed, seen, discussed, considered, sent or received by" Councilman Herb Wesson's office, our best advice to you is to seek those records from those offices, or the specific City Council office(s) you have in mind.

This Office will decline to produce any records that fall into any of the following, well-established exemptions to the CPRA: (i) records that are subject to attorney-client privilege and/or attorney work product doctrine; (ii) records whose disclosure would constitute an unwanted invasion of personal privacy, and may be withheld under Government Code §§6254(c), 6254.3, and/or 6254.20;

(iii) records that constitute "personnel...or similar files," and may be withheld pursuant to Government Code §6254(c); (iv) records pertaining to pending litigation in which the City of Los Angeles is a party; (v) records that are pre-decisional and advisory in nature and may be withheld pursuant to the deliberative process privilege pursuant to Government Code §6255; and (vi) records for which the public interest served by withholding the records clearly outweighs the public interest served by disclosure, and may be withheld pursuant to Government Code §6255.

Sincerely,

CARLOS SINGER

Deputy Chief Legal Counsel

Mayor Eric Garcetti

		CIVI-UTU					
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Chan Yong Jeong, Esq. (SBN 255244); Re	FOR COURT USE ONLY						
JEONG & LIKENS, L.C. 222 South Oxford Avenue	HOME WINE						
Los Angeles, CA 90004	FILED						
TELEPHONE NO.: 213-688-2001 ATTORNEY FOR (Name): Petitioner, HYE KYU	Superior Court of California County of Los Angeles						
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LO							
STREET ADDRESS: 111 North Hill Street		JUN 2 0 2018					
MAILING ADDRESS: 111 North Hill Street	Sherri R. Carter, Executive Onices Clerk of Court						
CITY AND ZIP CODE: Los Angeles, CA 900 BRANCH NAME: Central District, Stan	112 lev Mosk Courthouse	- 					
CASE NAME:	icy Work Courthouse	By Judy Deputy Judi Lara					
Joung v. City of Los Angeles et al.		agos day s					
CIVIL CASE COVER SHEET	Complex Case Designation	CASE NUMBER:					
✓ Unlimited	Counter Joinder	BS174104					
(Amount (Amount demanded is	Filed with first appearance by defer	JUDGE:					
exceeds \$25,000) \$25,000 or less)	(Cal. Rules of Court, rule 3.402						
Items 1–6 bel	ow must be completed (see instructions	on page 2).					
1. Check one box below for the case type that							
Auto Tort	Contract Breach of contract/warranty (06)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403)					
Auto (22) Uninsured motorist (46)	Rule 3.740 collections (09)	Antitrust/Trade regulation (03)					
Other PI/PD/WD (Personal Injury/Property	Other collections (09)	Construction defect (10)					
Damage/Wrongful Death) Tort	Insurance coverage (18)	Mass tort (40)					
Asbestos (04) Product liability (24)	Other contract (37)	Securities litigation (28)					
Medical malpractice (45)	Real Property Eminent domain/Inverse	Environmental/Toxic tort (30)					
Other PI/PD/WD (23)	condemnation (14)	Insurance coverage claims arising from the above listed provisionally complex case					
Non-PI/PD/WD (Other) Tort	Wrongful eviction (33)	types (41)					
Business tort/unfair business practice (07	•	Enforcement of Judgment					
Civil rights (08)	Unlawful Detainer	Enforcement of judgment (20)					
Defamation (13)	Commercial (31) Residential (32)	Miscellaneous Civil Complaint					
Fraud (16) Intellectual property (19)	Drugs (38)	RICO (27) Other complaint (not specified above) (42)					
Professional negligence (25)	Judicial Review	Miscellaneous Civil Petition					
Other non-PI/PD/WD tort (35)	Asset forfeiture (05)	Partnership and corporate governance (21)					
Employment	Petition re: arbitration award (11)	Other petition (not specified above) (43)					
Wrongful termination (36)	✓ Writ of mandate (02)						
2. This case is \checkmark is not com	Other judicial review (39)	tules of Court. If the case is complex, mark the					
factors requiring exceptional judicial mana		ules of court. If the case is complex, mark the					
a. Large number of separately repre	sented parties d. Large numb	er of witnesses					
b. Extensive motion practice raising		with related actions pending in one or more courts					
issues that will be time-consuming		nties, states, or countries, or in a federal court					
c. Substantial amount of documenta	ry evidence f Substantial p	postjudgment judicial supervision					
3. Remedies sought (check all that apply): a	. ✓ monetary b. ✓ nonmonetary;	declaratory or injunctive relief					
4. Number of causes of action (specify): 1							
5. This case is is not a class6. If there are any known related cases, file a	ss action suit.	may use form CM-015)					
Date: June 20, 2018	and serve a notice of related case. (700	They got form GW-015.)					
Chan Yong Jeong							
(TYPE OR PRINT NAME)		(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)					
Plaintiff must file this cover sheet with the	NOTICE first paper filed in the action or proceedi	ng (except small claims cases or cases filed					
		iles of Court, rule 3.220.) Failure to file may result					
in sanctions. File this cover sheet in addition to any cover sheet required by local court rule.							
If this case is complex under rule 3.400 et	If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all						
other parties to the action or proceeding.							
Unless this is a collections case under rule		Page 1 of 2					
Fổ/m Adopted for Mandatory Use Judicial Council of California CM-010 [Rev. July 1, 2007]	CIVIL CASE COVER SHEET	Cal. Rules of Court, rules 2.30, 3.220, 3.400–3.403, 3.740; Cal. Standards of Judicial Administration, std. 3.10 www.courtinfo.ca.gov					

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1. check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party. its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiffs designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

```
Auto Tort
```

Auto (22)-Personal Injury/Property Damage/Wrongful Death Uninsured Motorist (46) (if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)

Other PI/PD/WD (Personal Injury) Property Damage/Wrongful Death)

Asbestos (04) Asbestos Property Damage Asbestos Personal Injury/ Wrongful Death Product Liability (not asbestos or toxic/environmental) (24) Medical Malpractice (45) Medical Malpractice-Physicians & Surgeons Other Professional Health Care Malpractice Other PI/PD/WD (23) Premises Liability (e.g., slip and fall) Intentional Bodily Injury/PD/WD (e.g., assault, vandalism) Intentional Infliction of

Emotional Distress

Emotional Distress

Negligent Infliction of

Non-PI/PD/WD (Other) Tort

Other PI/PD/WD

Business Tort/Unfair Business Practice (07) Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08) Defamation (e.g., slander, libel) (13)Fraud (16) Intellectual Property (19) Professional Negligence (25) Legal Malpractice Other Professional Malpractice (not medical or legal) Other Non-PI/PD/WD Tort (35) Employment Wrongful Termination (36)

Other Employment (15)

CASE TYPES AND EXAMPLES

Contract Breach of Contract/Warranty (06) Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) Contract/Warranty Breach-Seller Plaintiff (not fraud or negligence)

Negligent Breach of Contract/ Warranty

Other Breach of Contract/Warranty Collections (e.g., money owed, open book accounts) (09) Collection Case-Seller Plaintiff Other Promissory Note/Collections Case

Insurance Coverage (not provisionally complex) (18)

Auto Subrogation Other Coverage Other Contract (37)

Contractual Fraud Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14) Wrongful Eviction (33)

Other Real Property (e.g., quiet title) (26) Writ of Possession of Real Property Mortgage Foreclosure

Quiet Title

Other Real Property (not eminent domain, landlord/tenant, or foreclosure)

Unlawful Detainer

Commercial (31) Residential (32)

Drugs (38) (if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)

Judicial Review

Asset Forfeiture (05) Petition Re: Arbitration Award (11) Writ of Mandate (02)
Writ-Administrative Mandamus

Writ-Mandamus on Limited Court Case Matter

Writ-Other Limited Court Case

Review

Other Judicial Review (39) Review of Health Officer Order Notice of Appeal-Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400-3.403)

Antitrust/Trade Regulation (03) Construction Defect (10) Claims Involving Mass Tort (40) Securities Litigation (28) Environmental/Toxic Tort (30) Insurance Coverage Claims (arising from provisionally complex case type listed above) (41)

Enforcement of Judgment

Enforcement of Judgment (20) Abstract of Judgment (Out of County)

Confession of Judgment (nondomestic relations) Sister State Judgment Administrative Agency Award (not unpaid taxes) Petition/Certification of Entry of

Judgment on Unpaid Taxes Other Enforcement of Judgment

Miscellaneous Civil Complaint

RICO (27)

Other Complaint (not specified above) (42) Declaratory Relief Only Injunctive Relief Only (non-

harassment)

Mechanics Lien

Other Commercial Complaint Case (non-tort/non-complex) Other Civil Complaint

(non-tort/non-complex)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21) Other Petition (not specified

above) (43) Civil Harassment Workplace Violence Elder/Dependent Adult Abuse **Election Contest** Petition for Name Change

Petition for Relief From Late Claim Other Civil Petition

ġ,

(L.)

(ئې رابير

CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION (CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.

- **Step 1:** After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.
- Step 2: In Column B, check the box for the type of action that best describes the nature of the case.
- **Step 3:** In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Court Filing Location (Column C)

- 1. Class actions must be filed in the Stanley Mosk Courthouse, Central District.
- 2. Permissive filing in central district.
- 3. Location where cause of action arose.
- 4. Mandatory personal injury filing in North District.
- 5. Location where performance required or defendant resides.
- 6. Location of property or permanently garaged vehicle.

- 7. Location where petitioner resides.
- 8. Location wherein defendant/respondent functions wholly.
- 9. Location where one or more of the parties reside.
- 10. Location of Labor Commissioner Office.
- 11. Mandatory filing location (Hub Cases unlawful detainer, limited non-collection, limited collection, or personal injury).

A Givil Case Cover Sheet Category No	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto (22)	□ A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1, 4, 11
Uninsured Motorist (46)	☐ A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1, 4, 11
Asbestos (04)	□ A6070 Asbestos Property Damage □ A7221 Asbestos - Personal Injury/Wrongful Death	1, 11 1, 11
Product Liability (24)	□ A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
Medical Malpractice (45)	 □ A7210 Medical Malpractice - Physicians & Surgeons □ A7240 Other Professional Health Care Malpractice 	1, 4, 11 1, 4, 11
Other Personal Injury Property Damage Wrongful Death (23)	 □ A7250 Premises Liability (e.g., slip and fall) □ A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) □ A7270 Intentional Infliction of Emotional Distress □ A7220 Other Personal Injury/Property Damage/Wrongful Death 	1, 4, 11 1, 4, 11 1, 4, 11 1, 4, 11

Auto-Tort

원국 / 역원Other Personal Injury/ Property Damage/ Wrongful Death Tort Joung v. City of Los Angeles et al.

CASE NUMBER

	A Civil Case Cover Sheet Category No	Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
	Business Tort (07)	□ A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
perty h Tort	Civil Rights (08)	□ A6005 Civil Rights/Discrimination	1, 2, 3
ry/ Pro I Deat	Defamation (13)	☐ A6010 Defamation (slander/libel)	1, 2, 3
al Injui ongfu	Fraud (16)	□ A6013 Fraud (no contract)	1, 2, 3
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Professional Negligence (25)	□ A6017 Legal Malpractice □ A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3 1, 2, 3
ŽΩ	Other (35)	□ A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
ent	Wrongful Termination (36)	□ A6037 Wrongful Termination	1, 2, 3
Employment	Other Employment (15)	□ A6024 Other Employment Complaint Case □ A6109 Labor Commissioner Appeals	1, 2, 3 10
	Breach of Contract/ Warranty (06) A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)		2, 5 2, 5 1, 2, 5 1, 2, 5
Contract	Collections (09)	 □ A6002 Collections Case-Seller Plaintiff □ A6012 Other Promissory Note/Collections Case □ A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014) 	5, 6, 11 5, 11 5, 6, 11
	Insurance Coverage (18)	☐ A6015 Insurance Coverage (not complex)	1, 2, 5, 8
	Other Contract (37)	 □ A6009 Contractual Fraud □ A6031 Tortious Interference □ A6027 Other Contract Dispute(not breach/insurance/fraud/negligence) 	1, 2, 3, 5 1, 2, 3, 5 1, 2, 3, 8, 9
	Eminent Domain/Inverse Condemnation (14)	□ A7300 Eminent Domain/Condemnation Number of parcels	2, 6
operty	Wrongful Eviction (33)	□ A6023 Wrongful Eviction Case	2, 6
। জু टु এ পু জু Unlawful Detainer Real Property	Other Real Property (26)	 □ A6018 Mortgage Foreclosure □ A6032 Quiet Title □ A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure) 	2, 6 2, 6 2, 6
	Unlawful Detainer-Commercial (31)	□ A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer-Residential (32)	☐ A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
₹₹ awful [Unlawful Detainer- Post-Foreclosure (34)	□ A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
ÿun Rulk	Unlawful Detainer-Drugs (38)	□ A6022 Unlawful Detainer-Drugs	2, 6, 11

SHORT TITLE Joung v. City of Los Angeles et al.

CASE NUMBER

	Civil Case Cover Sheet Category No		B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
ew	Asset Forfeiture (05)	-248.27%*	A6108 Asset Forfeiture Case	2, 3, 6
	Petition re Arbitration (11)	_	A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
Judicial Review		Ø	A6151 Writ - Administrative Mandamus	2, 8
cial	Writ of Mandate (02)		A6152 Writ - Mandamus on Limited Court Case Matter	2
Judi			A6153 Writ - Other Limited Court Case Review	2
	Other Judicial Review (39)	0	A6150 Other Writ /Judicial Review	2, 8
u.	Antitrust/Trade Regulation (03)		A6003 Antitrust/Trade Regulation	1, 2, 8
tigatio	Construction Defect (10)	0	A6007 Construction Defect	1, 2, 3
Provisionally Complex Litigation	Claims Involving Mass Tort (40)	0	A6006 Claims Involving Mass Tort	1, 2, 8
, Com	Securities Litigation (28)	-	A6035 Securities Litigation Case	1, 2, 8
sionall	Toxic Tort Environmental (30)		A6036 Toxic Tort/Environmental	1, 2, 3, 8
Provi	Insurance Coverage Claims from Complex Case (41)	0	A6014 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
,	,		A6141 Sister State Judgment	2, 5, 11
ב ב			A6160 Abstract of Judgment	2, 6
Enforcement of Judgment	Enforcement	0	A6107 Confession of Judgment (non-domestic relations)	2, 9
orce	of Judgment (20)		A6140 Administrative Agency Award (not unpaid taxes)	2, 8
Enfo of J	P of the state of		A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2, 8
4	,	0	A6112 Other Enforcement of Judgment Case	2, 8, 9
	RICO (27)	Ö	A6033 Racketeering (RICO) Case	1, 2, 8
aneous mplaints		_	A6030 Declaratory Relief Only	1, 2, 8
llan	Other Complaints		A6040 Injunctive Relief Only (not domestic/harassment)	2, 8
Miscella Civil Con	(Not Specified Above) (42)		A6011 Other Commercial Complaint Case (non-tort/non-complex)	1, 2, 8
Ğ. ≅	·		A6000 Other Civil Complaint (non-tort/non-complex)	1, 2, 8
	Partnership Corporation Governance (21)	٥	A6113 Partnership and Corporate Governance Case	2, 8
	•		A6121 Civil Harassment	2, 3, 9
Miscellaneous Civil Petitions			A6123 Workplace Harassment	2, 3, 9
	Other Detitions (Net		A6124 Elder/Dependent Adult Abuse Case	2, 3, 9
celli ii Pe	Other Petitions (Not	0	A6190 Election Contest	2
			A6110 Petition for Change of Name/Change of Gender	2, 7
ま) プ)			A6170 Petition for Relief from Late Claim Law	2, 3, 8
TT:4			A6100 Other Civil Petition	2, 9
를) 공		<u> </u>		-, -

SHORT TITLE: Joung v. City of Los Angeles et al.	CASE NUMBER

Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: □ 1. ② 2. □ 3. □ 4. □ 5. □ 6. □ 7. □ 8. □ 9. □ 10. □ 11.			ADDRESS: 200 N. Spring Street
CITY: Los Angeles	STATE:	ZIP CODE: 90012	

Step 5: Certification of Assignment: I certify that this case is properly filed in the Central Judicial District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated:	June 20, 2018	
Jaieu.		

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

- 1. Original Complaint or Petition.
- 2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
- 3. Civil Case Cover Sheet, Judicial Council form CM-010.
- 4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
- 5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
- 6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
- 7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.